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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 14-0285 JST
)	
Plaintiff,)	
)	
v.)	
)	STIPULATION AND [PROPOSED] ORDER
ALICIA MITTS,)	CHANGING HEARING DATE AND
)	EXCLUDING TIME
Defendant.)	
)	
)	
)	

The Court set March 27, 2015 at 9:30 a.m. as the date for a change of plea hearing. The parties request that the Court move that date to April 24, 2015, to provide the parties additional time to consider a resolution. Specifically, Defendant has requested that the United States Attorney's Office consider her for the Court's diversion program. New defense counsel only recently received medical records she had requested that were critical to her presentation of Defendant's candidacy for diversion. Armed with that material, Defendant made her request for consideration on Friday, March 20, 2015. The government is currently considering Defendant's request.

Should the government and United States Pretrial Services accept Defendant into the Court's diversion program, the parties anticipate that the case will resolve through a plea agreement with diversion as a condition of the agreement. The requested date of April 24, 2015 has been cleared with the Court's Courtroom Deputy as one that is available for such a change of plea.

The parties also request that the Court exclude the period from the date of this Order through April 24, 2015, from the time limits of 18 U.S.C. § 3161 for the purposes of effective preparation. The preparation is necessary to address any concerns the government or United States Pretrial Services may have with respect to diversion and to review case materials. The parties agree that the ends of justice served by granting such an exclusion of time outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

SO STIPULATED:

MELINDA HAAG

United States Attorney

DATED: March 26, 2015

_____/s/_____
KEVIN J. BARRY
Assistant United States Attorney

DATED: March 26, 2015

_____/s/_____
CAMELLIA BARAY
Attorney for ALICIA MITTS

Attestation of Filer

In addition to myself, the other signatory to this document is Camellia Baray. I attest that I have her permission to enter a conformed signature on her behalf and to file the document.

DATED: March 26, 2015

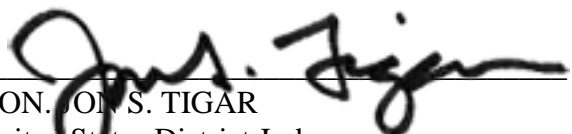
_____/s/_____
KEVIN J. BARRY
Assistant United States Attorney

~~[PROPOSED]~~ ORDER

For the reasons stated above, the Court changes the change of plea hearing to April 24, 2015. The Court also excludes the period from the date of this Order through April 24, 2015, from the time limits of 18 U.S.C. § 3161 for the purposes of effective preparation of counsel and continuity of counsel. The ends of justice served by granting such an exclusion of time outweigh the best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

IT IS SO ORDERED.

DATED: March 27, 2015


HON. JOHN S. TIGAR
United States District Judge